

Complaint (verified) In The United States District Court

Plaintiff's ;

1.1 Kyle Brandon Richards #641715
Baraga maximum Correctional Facility
13924 Wadaga rd, Baraga, MI, 49908

2.1 Kenneth D. Pruitt #708518
Baraga maximum Correctional Facility
13924 Wadaga rd, Baraga, MI, 49908

3.1 Robert Lee Kisse #575639
Baraga maximum Correctional Facility
13924 Wadaga rd, Baraga, MI, 49908

Vs.

Defendants ;

1.1 (First Name Unknown) Perttu
Residential Unit Manager
Baraga maximum Correctional Facility
13924 Wadaga rd, Baraga, MI, 49908
(Sued in 'Personal / Individual' Capacity)

Case #

Judge :

The Following is A Civil Action brought pursuant To 42 U.S.C 1983, And is A "Verified" Complaint, Signed Under The Penalty Of Perjury. A "Verified" Complaint Carries The Same Weight As An Affidavit, Pursuant To 28 U.S.C 1746.

NOTE: Throughout The Complaint 'Perttu' is Sometimes Spelled 'Perta'. Same Person.

STATEMENT OF JURISDICTION

The following Action is A Civil Rights Action brought Against R.U.M. Perta, A State Agent Acting Under The Color Of State Law, And Engaging in A Repetitious Pattern Of Sexual Harassment And Sexual Abuse.

The Cause Of Action is Properly Stated Under 42 U.S.C 1983.

Note: Throughout The Complaint, 'Perrtu' is Also Sometimes Spelled 'Perta' Which is A Variation.

All Allegations Are Asserted Against R.U.M 'Perrtu' Who is Sued in His 'Individual / Personal' Capacity.

STATEMENT OF FACTS AND CLAIMS

For The Past Year, since his Promotion, The Residential Unit manager (R.U.m Perta) HAS Engaged in A Pattern Of Prolific And Repetative Sexual Abuse, Against AT LEAST A Dozen Inmates we know Of.

Attempts To Reason With R.U.m Perta Have been Frivolous, Unproductive, And Resulted Only in Retaliation. These Acts range From 'Destroying Inmates Legal mail', 'Throwing Out grievances' And 'Extorting Inmates To Perform Sexual Acts.'

We, Plaintiffs, Attempted To Exhaust Remedies To The best Of Our Ability. We Fear For Our Life And Safety And Need IMMEDIATE intervention. We Need The Immediate Aid Of Federal Law Enforcement Agencies, F.B.I, U.S marshals, And THE UNITED STATES ATTORNEY.

We've CONTACTED Non Profit Sexual Abuse Centers Like J.D.I (Just Detention International) And A.F.S.C, And There is Little They Can Do To Help.

many Non Profit Groups recommended we file This Complaint With The U.S Federal Court. We file This Action AT risk To Our lives And Safety.

This is Our Last resort In An Attempt To Stop A Viscious, Sexual Predator From Continuing His Preying On Vulnerable Helpless Inmates.

CLAIM 1.1

For The Past year All 3 Plaintiffs Have Endured Prolific sexual Harassment AT The Hands Of R.U.M Perta. This Sexual Abuse Has Grown 'Worse And worse' Every Day. All 3 Plaintiffs Now Fear For Their life And Safety. We Are Under The Imminent Threat Of Serious Physical Harm.

This Claim is STATED For Actions inflicted In Violation Of The 8th, AND 14th Ammenaments Of The United States Constitution. (P.R.E.A)

1.1 On 6.20.19, R.U.M Perta Stopped Plaintiff Richards On The Facility Walkway, AT Around 2 O'clock, STATing Directly To Plaintiff, "We Need To Talk";

LATER THAT DAY ON THE STAIRWELL OF B-WING IN HOUSING UNIT 6, R.U.M PERTA CONTINUED DIALOGUE WITH PLAINTIFF RICHARDS, STATING; "I CAN MAKE YOUR STAY ALOT more COMFORTABLE, BUT ILL NEED YOU TO DO ME A FAVOR." R.U.M PERTA FURTHER CONFESSED HE WAS 'COMMING OUT' AND THAT HE WANTED TO EXPLORE HIS NEWFOUND SEXUALITY WITH PLAINTIFF RICHARDS. PLAINTIFF RICHARDS DECLINED R.U.M PERTA'S OFFER AND RESPONDED BY SAYING; "LEAVE ME THE HELL ALONE." R.U.M PERTA, APPEARED OFFENDED AND PERSISTED; "ILL FUCKING KILL YOU IF YOU SAY ANYTHING."

2.1 ON AUGUST 19, 2019, R.U.M PERTA APPROACHED PLAINTIFF RICHARDS CELL DOOR, IN HOUSING UNIT 6. HE MADE DIRECT EYE CONTACT WITH PLAINTIFF, AND STATED; "YOUR EITHER GOING TO PLAY BALL AND START FUCKING LIKE EVERYONE, OR IM GOING TO SEND YOU STRAIGHT TO THE FUCKING HOLE." R.U.M PERTA EXPLAINED TO PLAINTIFF THAT HE COULD "MAKE MONEY" AND PERTA STATED; "WORK FOR ME AND ILL LET YOU RUN." R.U.M PERTA IMPLIED HE WOULD ASSIST PLAINTIFF IN ESCAPING IF PLAINTIFF ENGAGED IN "SEX WORK" FOR R.U.M PERTA.

3.1 On August 20, 2019, R.U.M. PERTA, APPROACHED PLAINTIFF RICHARDS DOOR AGAIN, IN 6 UNIT HOUSING BLOCK, STATING; "THIS IS YOUR LAST CHANCE, BOY, YOUR GOING TO FUCK FOR ME, BOY, OR ILL HAVE YOUR ASS, BOY. NOBODY, TELLS ME, NO." HE ANGRILY POINTED HIS FINGER DIRECTLY IN THE WINDOW OF MY CELL DOOR.

4.1 On January 7, 2020, DURING morning rounds R.U.M. PERTA APPROACHED PLAINTIFF RICHARDS DOOR AT HOUSING UNIT 3 AND STATED; "DO WHAT THE FUCK I TELL YOU TO DO. FUCK WHO I TELL YOU TO FUCK." PLAINTIFF RICHARDS IN CELL 229, STATED "NO, I WONT." R.U.M. PERTA RESPONDED; "THEN IM GOING TO KILL YOU." (THIS DIALOGUE WAS WITNESSED BY FELLOW INMATE PLAINTIFF FRUITT #708518, WHO WAS RIGHT ACROSS THE HALL.) AND PLAINTIFF ROBERT KISSEE #575639, WHO WAS IN 230.)

5.1 On January 15, 2020, DURING morning rounds R.U.M. PERTA APPROACHED PLAINTIFF RICHARDS DOOR AND STATED; "ARE YOU SICK OF SEGREGATION. I BET YOU WANT OUT. YOU KNOW WHAT YOU HAVE TO DO. FUCK WHO I TELL YOU TO AND ILL LET YOU GO." PLAINTIFF RICHARDS RESPONDED "NO, I WONT." R.U.M. PERTA LAUGHED.

(THIS CONVERSATION WAS WITNESSED BY INMATE FRUITT #708518, WHO IS ALSO A PLAINTIFF, AS WELL AS PLAINTIFF ROBERT KISSEE #575639, WHO LOCKED NEXT DOOR IN CELL 230.)

- 6.1 On January 22nd 2020, During morning rounds R.U.M Perta stopped at Plaintiff Richards Cell 229 in Housing Unit 3, and looking directly at Richards stated; "Boy, I can keep you in here forever. Just do what I ask you to." This remark was also witnessed by Plaintiff Inmate Pruitt # 708518 and Plaintiff Robert Kissecc # 575639, who locked next door in Cell 230.
- 7.1 On January 29, 2020, during morning rounds R.U.M Perta approached Cell 229 in Housing Unit 3, and began to laugh saying, "you taking a piss boy, let me see that dick." The Plaintiff Richards responded; "Leave me alone." R.U.M Perta stated; "No, I won't." This conversation was witnessed by Plaintiff Inmate Pruitt #708518 and Plaintiff Robert Kissecc #575639, who locked next door in Cell 230.
- 8.1 On February 4th 2020, During morning rounds R.U.M Perta approached Plaintiff Richards door and stated; "Come on bitch boy, take another piss for me. Piss for me boy, and I'll let you go home." Inmate Richards responded stating; "Please stop harrassing me" and "Please leave me alone." R.U.M Perta responded stating; "Boy, I'll fucking kill you boy. wait until I get my hands on your pretty little mouth." This conversation was witnessed by Plaintiff Inmate Pruitt # 708518, and Plaintiff Robert Kissecc #575639 who locked next door.

- 9.1 On February 12TH 2020, during morning rounds R.U.M. Perta approached cell 229, Inmate Richards Cell in Housing Unit 3, and stated, "TICK TOCK boy. YOU GOING TO GIVE ME YOUR ASS, ONE WAY OR ANOTHER." These words were witnessed by Inmate AND Plaintiff PRUITT # 708518, who locked in cell 238, and directly observed the whole dialogue, as well as Plaintiff ROBERT KISSECC # 575639, who locked next door in cell 230.
- 10.1 On February 18TH 2020, during morning rounds R.U.M. Perta approached cell 229, Inmate Richards Cell in Housing Unit 3, and stated; "I HAVE THE POWER TO KEEP YOU IN SEGREGATION FOREVER. OR YOU CAN FUCK FOR ME, BOY." These words were witnessed by Inmate AND Plaintiff PRUITT # 708518 AND; Plaintiff ROBERT KISSECC # 575639 who locked next door in cell 230.
- 11.1 On February 26TH 2020, during morning rounds R.U.M. Perta approached cell 229, Inmate Richards Cell in Housing Unit 3, and stated; "I BET YOU GOING CRAZY. YOU KNOW WHAT YOU HAVE TO DO. JACK OFF BOY." These words were witnessed by Inmate AND Plaintiff PRUITT # 708518, AND Plaintiff ROBERT KISSECC # 575639.
- 12.1 On MARCH 4TH 2020, during morning rounds R.U.M. Perta approached Inmate Richards Cell 229 in Housing Unit 3, and stated: "HAVE YOU HAD ENOUGH. READY TO PLAY BALL?" These words were witnessed by Inmate AND Plaintiff PRUITT # 708518; AND Plaintiff ROBERT KISSECC # 575639.

- 13.) On March 10th 2020, during his morning rounds R.U.M. Perta approached Cell 229 in Housing Unit 3 and stated; "Are you jacking off, boy." Plaintiff Richards responded; "No, Sir, I'm taking a piss. Please go away." R.U.M. Perta responded; "I'm not going away. I want you to piss on me." This dialogue was directly witnessed by Plaintiff and Inmate Pruitt # 708518, and Plaintiff Robert Kissecc # 575639.
- 14.) On March 18th 2020, during his morning rounds R.U.M. Perta approached Cell 229 in Housing Unit 3 and stated to Plaintiff Richards; "When you get out, I want you to piss on me boy, like you pissed in that toilet bowl." Plaintiff Richards responded; "Please leave me alone." This dialogue was directly witnessed by Plaintiff and Inmate Pruitt # 708518, who looked directly across the hall from Plaintiff Richards, and Plaintiff Robert Kissecc # 575639.
- 15.) On March 26th 2020, during his morning rounds, approached Cell 229, in Housing Unit 3, R.U.M. Perta, stated directly to Plaintiff Richards; "I know you got a Parole Hearing coming up soon. If you want to go home then you will give me what I want." When Plaintiff Richards started to protest, R.U.M. Perta stated "Give me your ass if you want a Parole." These statements were witnessed by Inmate Plaintiff Pruitt # 708518, and Plaintiff Robert Kissecc # 575639.

- 16.1 On April 1st 2020, during his morning rounds R.U.M Perta approached Plaintiff Richards Cell 3-d-229 - Housing Unit 3 and stated;
"Im going to get your Ass, boy. Its just a matter of time before you give in."
This statement was witnessed by Plaintiff and Inmate Pruitt # 708518, and Plaintiff Robert Lee Kisse # 575639.
- 17.1 On April 13, 2020, during his morning rounds R.U.M Perta approached Plaintiff Richards Cell 3-d-229 - Housing Unit 3 and stated;
"Its almost been a year Im going to have to let you out soon. But if you dont give up your ass, Ill send you right back." This statement was also witnessed by Plaintiff Pruitt # 708518, and Kisse # 575639.
- 18.1 On, April 14, 2020, during shower time, Around 9 'O'clock, on D-wing, R.U.M Perta turned his head and looked directly into the left shower stall, looking directly at Plaintiff Richards Genative Area, and stated; "Ill come in there and take that from you if I have too." R.U.M Perta then began to jingle his keys in a manner meant to intimidate Plaintiff Richards. This was witnessed by both plaintiffs Pruitt # 708518 and Kisse # 575639.

Actual Injury : Plaintiff Richards has suffered "Physical Injury" as a result of stress related complications, pertaining to the trauma of dealing with sexual abuse. Psycho somatic affects include 'Vommiting', 'Lethargy', 'Unhealthy weight gain' and 'High blood Pressure.'

An Inmate cannot make claims for Psychological Injury without first showing 'Physical Injury.' Plaintiff Richards has indeed met this threshold.

Plaintiff Pruitt # 708518, witnessed Plaintiff Richards Vommiting blood on January, 7th March, 26th, and April 14th, of 2020. Internal bleeding has caused Fatigue, Nausea, and Lethargy.

Psychological Injury includes P.T.S.D, 'Claustrophobia' and 'Xenophobia' and other yet to be determined effects of Psychological Trauma. (Expert needed)

A non-M.D.O.C Neutral medical expert will be needed to determine the full extent of 'Physical' and 'mental' Injury.

On March 27-2020 and Unit 3-Dwing 238, R.U.M Perta came to prisoner Pruitt Sell door and said to me its ~~and~~ Policy that me myself and prisoner's have to be half nude to come out for the shower. And I asked where does it say we have to be nude and R.U.M Perta said to me they like seeing my lovely arms and chest. R.U.M Perta told me to get comfortable and Segregation Pruitt. Plaintiff Richards witnessed everything which is right accross the hall way from me.

2.) On April 1-2020 and Unit 3-Dwing 238, R.U.M Perta was making his morning rounds and Unit 3 I came to my Sell door and asked R.U.M Perta when was he running SCC again. R.U.M Perta stated to me stop Showing your dick to my female officer's and I would know when the nexts SCC was. I said to R.U.M Perta where does it say and Policy you can lie on me or talk to me like that R.U.M Perta told me again to stop showing my dick and I walked away from the door. Prisoner Richards witnessed everything being said to me accross the hall way from me.

(BOTH PLAINTIFFS HAVE SIGNED THIS "VERIFIED"
COMPLAINT, PURSUANT TO;
WHICH SERVES AS A "AFFIDAVIT" FOR THE
PURPOSE OF EVIDENCE.)

April 14-2020 and Unit 3-Awing 238, R.U.M Perta Stopped at my cell door and stated to me are you down with showing your half nude body to my female officer's and I said to R.U.M Perta Stop playing with me like that cause "I don't play like that". R.U.M Perta stated to me "you either going to play my game or I'm going to keep you and the hole till you max's out". Plaintiff Richards witnessed everything R.U.M Perta was saying to me being right accross the hall way from me and Cell 229.

4.) On April 14-2020 and Unit 3-Awing 238, During morning Shower's R.U.M Perta stated to me why I "was and the Shower are you down being and Segregation and are you Sick yet", R.U.M Perta stated "I bet you want out", and I said "yes" to him wanting to get out of the hole. R.U.M Perta said to me "you know what I want you to do for me", and I said "whats that" he told me to beat a dick off and I well let you go. Plaintiff Richards heard everything being right nexts door to me and the Shower box's and responded "What the fuck are you saying to that man nexts door to me" and I told prisoner Richards don't try I'm going to write him up". R.U.M Perta Laughed down the stair's from the Shower. Prisoner Richards witnessed everything.

April 16-2020 and Unit 3-During morning rounds R.U.M.Perta approached cell 238 prisoner Pruitt cell door and stated, "you know what I want you to do for me fuck nigga? This was witnessed by Inmate Richards accross the hole way from me.

CLAIM 1 ALLEGATIONS RELATING TO PRISONER PRUITT / PLAINTIFF PRUITT ARE SECTIONED IN PREVIOUS PAGES, bulletins # 1 - 5.

DUE TO EXCESS STRESS AND TRAUMA, PLAINTIFF PRUITT IS ENDURING ONGOING PHYSICAL INJURY, INCLUDING 'VOMMITTING', 'WEIGHT LOSS', AND 'HIGH blood Pressure.

EXTENT OF PHYSICAL AND PSYCHOLOGICAL INJURY NEEDS TO BE DETERMINED BY A MEDICAL EXPERT.

(SEE LAST PAGES FOR 'VERIFICATION')

Signature:
Daneal Pruitt Junior 708518

Claims by Plaintiff Robert Lee KISSEE

- 1.1 On Jan. 23 , 2020 , R.O.M Perito came To Plaintiff KISSEE's cell door 230 in 3 Block. Plaintiff KISSEE ASKED HIM, "When will I be released," From Segregation. R.O.M Perito's response was, " you wont NEVER GET OUT OF The hole AS LONG AS YOU STAY SUCKING THEM NIGGA DICKS." This insinuation OF HOMOSEXUALITY WAS MEANT TO HARRASS Plaintiff KISSEE. These STATEMENTS WERE ALSO WITNESSED by Plaintiff RICHARDS #641715, who locked next door.
- 2.1 On February 13 , 2020 , R.O.M Perito DID A round , AND APPROACHED Plaintiff KISSEE's Cell door 230 AND SAID : "Mr. KISSEE, Are you ready To be white Again AND leave Black meat ALONE. JACK OFF boy." This WAS ALSO WITNESSED by Plaintiff RICHARDS #641715, who locked next door.
- 3.1 Again On February 20 , 2020 , R.O.M Perito DID A round AND APPROACHED my door Again. Plaintiff KISSEE ASKED HIM, "Why DO you keep HARRASSING me?" R.O.M Perito responded ; " Cause, Where I Come From, Nigger LOVERS DONT LAST. Lover boy. Fuck For me." The Comments WERE ALSO WITNESSED by Plaintiff RICHARDS.

4.1 On March, 9, 2020, R.U.M Perttu came To Plaintiff Kissee's cell door And said ; " you better remember, White people rule The world, I can have you killed And Nobody will ever know. Unless you Jack Off For me boy." These words were also witnessed by plaintiff Richards, who locks right next door.

5.1 On April 9, 2020, During morning rounds, I asked R.U.M Perttu, "Why have I been in The Hole so long, I see The Parole Board in October, And Im Trying To Go Home." R.U.M Perttu responded To plaintiff Kissee, stating ; " Since you suck Nigger Dick, you should let me make some money off you." Plaintiff Kissee responded ; " What do you mean by That?" And R.U.M Perttu answered ; " you be my hoe And sell your body. In Exchange I'll give you Drugs And A Cell Phone." Plaintiff Kissee Objected ; "Im Not Gay." R.U.M Perttu replied ; " Then you won't ever get out of The Hole."

Over The PAST SIX MONTHS, The behavior OF R.U.M Perttu, And His Sexual Abuse Has Grown increasingly worse. The Intimidation And Threats Place Plaintiffs in Immediate Risk Of Physical Harm.

R.U.M Perttu is using his Authority To;

- 1.1 Force Plaintiffs And Other inmates To strip naked And Expose Themselves To him.
- 2.1 Force Plaintiffs And Other inmates To masturbate For him, Against Their Will.
- 3.1 Force Plaintiffs To Perform Sexual Acts For him, Against Their Will, Even To The Point Of Rape.

Refusal To Comply With R.U.M Perttu's demands results in Retaliation, And Ongoing Threats Of Physical Violence Against Plaintiffs. The Plaintiffs Are in mortal Danger. (Supplemental Claims Are brought under MEL 750.145 m/n For 'Vulnerable Adult Abuse.'], As under U.S CONST. AMM #8 AND 14, AND 1

Claim 2.1

Plaintiffs have been duly prevented from filing grievances, complaints, or petitions, unable to pursue or exhaust administrative remedies or grievances related to this matter.

More so, Plaintiffs were threatened and retaliated against for 'attempting' to file grievances pertaining to issues of litigation present in this complaint, and are currently in physical peril.

Plaintiffs were not only obstructed from exhausting administrative remedies, but have been threatened with mortal danger for diligently trying to do so.

All Plaintiffs made a diligent effort to resolve the said dispute, but were persistently 'obstructed' from exhausting remedies. Plaintiffs fear for their life and safety and are under the imminent threat of serious physical harm.

(Plaintiff Richards)

- 1.1 On August 19TH 2019, Plaintiff Richards had submitted 4 Prea (Prison Rape Elimination Act) Grievances Against R.U.M Perta For Sexual Advances he made Towards me, As described in Claim 1. Durring Afternoon Showers, I Had Submitted The Grievance directly To The Unit 6 mail box.

AT AROUND 10 O,CLOCK A.M, R.U.M PERTA APPROACHED PLAINTIFF RICHARDS CELL DOOR, Holding The Same Grievances. R.U.M PERTA STATED; "Im NOT LETTING YOU FILE These Grievances." He Proceeded To rip Them Up in Front OF me, ~~in~~

- 2.1 I WAS ABLE TO SUBMITT OVER A DOZEN Grievances, UNRELATED TO Sexual Abuse, AND They Were Processed. PLAINTIFF WAS ABLE TO SUBMITT "Some" Grievances.

HOWEVER, Any Grievances Submitted Related To 'Sexual Abuse', NIEVER GOT Processed AND Were DESTROYED. On August 20TH 2019, R.U.M PERTA STATED; "Im NOT Going To let you file Any Sexual ASSAULT Grievances."

- 3.1 On January 15, 2020, plaintiff RICHARDS submitted 4 additional P.R.E.A Grievances, by placing them in his door. R.U.M PERTA came by in the morning, and snatched the grievances out of my door, stating; "These are going in the garbage". Plaintiff PRUITT also directly witnessed these acts, as well as Plaintiff KISSEE.
- 4.1 On March 18, 2020, Plaintiff RICHARDS called the P.R.E.A Phone Line, and reported R.U.M PERTA for sexual abuse. A week later, on March 23rd the M.D.O.C P.R.E.A Coordinator came up to visit Plaintiff RICHARDS who spoke at length about the sexual abuse.
- 5.1 On April 13, 2020, R.U.M PERTA approached plaintiff RICHARDS door at Cell 229 in Housing Unit 3 and stated; "Go ahead and keep filing grievances. We're reading them. I choose which ones I'll let you file." These words were also witnessed by Plaintiff PRUITT, and Plaintiff ROBERT KISSEE.

- 6.1 On April, 14th, 2020, during morning rounds R.U.M. Perta Approached ~~my~~ plaintiff RICHARDS Cell door 229 in Unit 3 AND STATED TO Plaintiff RICHARDS, "SEND ANOTHER FUCKING GRIEVANCE boy, AND I'll FUCKING Kill you, boy." R.U.M. Perta Appeared Angry AND Annoyed. This WAS ALSO witnessed by Plaintiff PRUITT.
- 7.1 On April 15, 2020, during morning rounds, R.U.M. Perta came running by plaintiff RICHARDS Cell AND SNATCHED 3 P.R.E.A GRIEVANCES OUT OF Plaintiff RICHARDS DOOR. HE proceeded TO Rip Them Up AND STATED; "WHY DONT YOU STOP IT, boy" This WAS ALSO witnessed by Plaintiff PRUITT, AND Plaintiff Robert KISSEE.
- 8.1 On April 16, 2020, during morning rounds R.U.M. Perta came TO Plaintiff RICHARDS Cell Door, yelling; "WAKE UP mother Fucker, WAKE UP." R.U.M. Perta Then PUT his key In The door slot AND Acted like he WAS going TO Open The Door AND STATED; "NO more FUCKING GRIEVANCES." This WAS ALSO witnessed by Plaintiff PRUITT, AND Plaintiff Robert KISSEE.

(Plaintiff Pruitt)

1.1 On february 11th 2020, R.U.M Perta Approached Plaintiff Pruitts Cell 238, in housing unit 3, AND SNATCHED 2 P.R.E.A Grievances OUT OF The Door. He read Them ALoud AND Then STATED; "These Are going in The TRASH" He Then WAIKED AWAY, Crumpling UP The Grievances in his Hand. This WAS ALSO Witnessed by Plaintiff RICHARDS.

2.1 On march, 19th, 2020, R.U.M Perta Approached Plaintiff Pruitts Cell 238, in HOUSING UNIT 3 AND WAS holding A P.R.E.A Grievance in his HAnd, R.U.M Perta Then STATED; "Im NOT Letting YOU file These. Their going in The Garbage." He Then WAIKED AWAY. This WAS ALSO Witnessed by Plaintiff RICHARDS.

3.1 On April 15, 2020, R.U.M Perta STOPPED AT Plaintiff Pruitts Cell Holding A 'P.R.E.A' Grievance. He STATED; "I Told YOU. NO more Grievances. Ill FUKing Kill YOU." He Then PROCEEDED To rip UP The Grievance. This WAS ALSO Witnessed by Plaintiff RICHARDS.

(Plaintiff Robert L. Kissee)

- 1.1 On January, 21, 2020, R.U.M. Perttu, during his morning rounds, stopped at Plaintiff Kissee's Cell 230 door and snatched two P.R.E.A Grievances out of the side of the door and stated: "I'm not letting you file these." RUM Perttu then proceeded to rip up the grievances. This was also witnessed by Plaintiff Richards #641715.

- 2.1 On February, 17, 2020, during morning rounds R.U.M. Perttu ran past cell 230 and snatched 3 P.R.E.A Grievances out of the door. These grievance were placed in the door for submission. R.U.M. Perttu then 'Crumpled' the grievances in his hand and tossed them across the hallway, stating: "Quit Fucking complaining." This was also witnessed by Plaintiff Richards #641715.

- 3.1 On April, 15, 2020, in the afternoon R.U.M. Perttu approached Plaintiff Kissee's Cell at cell 230, holding 2 P.R.E.A grievance forms. R.U.M. Perttu stated "File another fucking grievance Kissee and I'll fucking kill you." Then ripped up both grievances. This was also witnessed by Plaintiff Richards.

All 3 Plaintiffs made diligent Attempts To file multiple P.R.E.A Grievances based on Prolific Sexual Harrassment And Life Threatening Retaliation. (In violation of U.S Constitution Am 1,8,14)

MONTH AFTER MONTH, plaintiffs Have Submitted 'Dozens' of P.R.E.A Grievances, Only To Have R.U.M Pertto Piifer Through The mail box or Snatch Our Grievances Out Of Our Door, And Rip Them Up in Front Of Us.

Plaintiffs Have not Only been Obstructed From Exhausting remedies, but Have been Threatened With mortal Danger For diligently Trying To Do So.

Apart From Grievances, plaintiffs Have made Over A dozen Complaints To The AMF P.R.E.A Coordinators, And Several Non Profit Advocacy groups, Such As (J.D.I) Just Detention International And AFSC.

Plaintiffs Are in Immediate danger And Fear For Their Safety, pleading For Immediate Intervention. Claims Are brought for violation Of U.S Constitution Ammenoments 1, 8, And 14. (Supplemental claims Are brought under MCL 750.145 m/n)

Claim 3.1

All 3 plaintiffs claim they are being wrongfully held in administrative segregation in retaliation for filing grievances or "attempting" to file grievances and complaints related to ongoing sexual abuse.

Plaintiffs claim that 'R.O.M. Pettu' set up plaintiffs with fraudulent misconducts, in order to isolate them in administrative segregation, where they would have a more difficult time reporting sexual abuse.

It is a well known fact of criminology and criminal behavior that sexual deviant predators, always seek to isolate their victims. Isolation is a form of control necessary for ongoing victimization to continue.

In administrative segregation plaintiffs are relatively isolated, have limited access to phone, with restrictions on both mail and email. It is a perfect environment for sexual abuse.

The following details how Each Plaintiff was Fraudulantly Set up, And Or 'Entrapped' into being Placed in Administrative Segregation.

(Plaintiff Richards)

- 1.) plaintiff; Kyle B. Richards, is A Well Documented 'Vulnerable' Adult, Classified AS A Vulnerable Adult, Under M.C.L 750.145 (m) AND (N), AND reserved A Special Protected Status Due To A Host Of mental Disabilities.

Plaintiff Richards disabilities range From The following formal Diagnosis ;

- 1.1 P.T.S.D

diagnosed by Dr. Mammoun Dabbagh
AT HAVENWYCK HOSPITAL in 2/ 1998

- 2.1 Pervasive Developmental Disorder
diagnosed by Dr. Ismail Sendi in
2004-05 AT HAVENWYCK HOSPITAL.

- 3.1 Anti Social Personality Disorder
diagnosed by Dr. Rickman AT
Center For forensic Psychiatry in
2009.

4.1 NARCISSISTIC PERSONALITY DISORDER
diagnosed by Dr. Rickman AT The Center
For Forensic Psychiatry in 2009.

(see Exhibit A , For diagnostic Proofs)

Due To plaintiffs mental Disabilities IT IS
impossible For Plaintiff To double bunk in
Close Proximity To Other inmates in A Prison
Environment.

Plaintiffs disabilities make him Excessively
Vulnerable To 'Violence', 'Sexual Assault'
And Exploitation, by Other inmates And
Even Staff. For This Reason Plaintiff
Can ONLY Safely Lock in A Level 5
Prison And requires A 'Single Cell'
Detail.

Plaintiff Has been ATTACKED, beat, And
Sexually Assaulted in The Past, As
A Result Of being Double Bunked
With Violent Predatory inmates.
Plaintiff Richards is NOT Supposed
To Double Bunk under Any Circumstances.

In Retaliation for Filing Grievances And Complaints, R.U.M Perttu refuted Plaintiff's Single Cell detail And deliberately Placed Plaintiff On A "Transfer" List, To be Sent To A 'dangerous' Less Secure Level 4 Prison. In Level 4 Prisons, Plaintiff would be Forced To Double Bunk With Violent Inmates.

On 8-20-19 (August 20, 2019) R.U.M Perttu Told Plaintiff Richards, "since you wont do what I want, Im sending you down To Level 4, where youll really have it BAD."

On 8-20-19, Plaintiff Richards refused To Comply With A "Retaliatory" Transfer. As A result, Plaintiff was Sent To 'Administrative Segregation' Several misconduct reports were Fabricated by The Direction Of R.U.M Perttu.

MONTH AFTER MONTH, R.U.M Perttu Finds And Conjures 'Excuses' To Keep Plaintiff Richards in Segregation, Despite Persistent Positive Behavior.

(Plaintiff Pruitt)

In Oct. August, R.U.M. Perttu Arranged For Several Inmates To Physically Attack Prisoner Pruitt. After Prisoner Plaintiff 'Pruitt' Took 'Preemptory' Action In Self Defense, Plaintiff Pruitt Was Thrown In Administrative Segregation by R.U.M. Perttu.

On Jan. 5th 2020, R.U.M. Perttu Came Prisoner Pruitts door And Stated ;
" YOU LIKE HOW I HAD YOU HIT.
Everytime YOU GET OUT, I'll HAVE YOU HIT AGAIN AND AGAIN AND SENT RIGHT BACK TO segregation."
These words were also witnessed by Plaintiff Richards.

Plaintiff Pruitt Was Forced To Take Preemptory measures, And Attack A Prisoner R.U.M. Perttu Sent To Attack Him. Although The Plaintiff Was found Guilty Of misconduct, His Actions were in Self Defense.

(Plaintiff KISSEE)

R.U.M Perttu, in June of 2019 (6-6-19) sent A white NATIONALIST Inmate To ATTACK Plaintiff Robert KISSEE. Plaintiff KISSEE WAS FORCED UNDER DURESS To FIGHT back. AS A result, Plaintiff KISSEE WAS found GUILTY OF Fighting / ASSAULT, And HAS been Held in Segregation For 10 months.

On April 17th 2020, R.U.M Perttu Came To Plaintiff KISSEE's door And STATED ; "AS soon AS you get out, Im sending Someone After you Again." These words were ALSO Witnessed by Plaintiff RICHARDS #641715.

P1 R.U.M Perttu is deliberately setting up Scenarios To Entrapp Plaintiffs into incurring misconducts. Sometimes R.U.M Perttu fabricates misconducts. This "Entrapment" is A Tactic Of manipulation R.U.M Perttu Uses To keep Plaintiffs in Segregation.

All 3 Plaintiffs have maintained Absolute Excellent behavior, Even while in Adm. Segregation. There is no reason whatsoever, That After 6 months, Plaintiffs Should Still be Held in Segregation.

R.U.M Perttu's Classification of Plaintiffs To Administrative Segregation, is Absolutely Unreasonable, Vexatious, and Plainly Retaliatory.

Retaliation Against Inmates For Filing Grievances is A 1st Amm. Constitutional Violation.

BOTH Plaintiff Richards, Kisse, and Pruitt Have Suffered Physical and Mental Injury.

Plaintiff Assert Claims Under U.S Constitution Amendments # 1, 8, and 14, As well As A.D.A (American W/ Disabilities Act.) Plaintiff Richards who is mentally ill cannot legally be held in Segregation.

Claim 4 ;

Plaintiffs Richards, Pruitt, and Kisseck assert that R.U.M. Perttu have unlawfully retaliated against them for filing grievances and complaints by shutting down their 'JPay' accounts, and refusing to allow them to have access to their JPS media player, or access the JPS media store.

On 3.20.20 R.U.M. Perttu told all 3 plaintiffs ; " since you won't give me what I want, none of you are getting your JPay."

All three plaintiffs for over 10 months have, been denied access to their JPS player and access to their accounts and media store.

Plaintiffs assert that this retaliatory deprivation, violates their constitutional rights, under U.S. Constitution Amendments # 1, 5, and 14, and is NOT consistent with any rational penological interest.

This retaliatory deprivation of JPay Access is also consistent with R.U.M Perttu's ongoing pattern of sexual abuse.

By depriving Plaintiffs Access to their JPay Accounts, R.U.M Perttu, is Objectively Preventing Plaintiffs From Communicating with their Families via JPay Email Services.

By Restraining All Plaintiffs Communication to 'Written' Pen and Paper mail, R.U.M Perttu can more easily monitor and control Plaintiffs outgoing letters. Electronic Communication is more difficult for R.U.M Perttu to control, and monitor.

This deprivation of JPay Access makes it more difficult for Plaintiffs to communicate sexual abuse and increases the degree of burden and hardship Plaintiffs are suffering.

Claim 5 ;

All 3 Plaintiffs Claim R.U.m Perttu Has Retaliated Against Plaintiffs For Filing Grievances And Complaints by refusing To Provide And Depriving Plaintiffs Of Access To 'Lined' or 'Columned' Paper, Of Appropriate Size.

R.U.m Perttu Will Only Provide Plaintiffs 'Blank' Typing Paper, That is Almost Impossible To Write A Legible Pleading On.

Without Columns / Lined Columns, Plaintiffs Struggle To Write in Legible Straight Lines And Draft Acceptable Pleadings. By Depriving Plaintiffs Of Lined Paper, R.U.m Perttu is Essentially Obstructing Judicial Access.

Worse is The blank Paper Provided is 'Oversized' being 20 inches Long, which is NOT Standard For Legal Submission.

Plaintiffs Richards And Pruitt Are indigent And Cannot Afford To Purchase Typewriters. Due To both Plaintiff Pruitt And plaintiff Richards Severe mental handicaps, it is Impossible For Either Of Them To Handwrite Their Legal Pleadings.

Not Only Has R.U.M Perttu Deprived Plaintiffs Of Lined or Columned Paper, but he has Also Deprived both Plaintiffs Who Are indigent Of Access To A Typewriter, or Necessary Writing instrument.

R.U.M Perttu has made it Difficult To impossible For Plaintiffs To Draft Acceptable Legal Pleadings. R.U.M Perttu is Attempting To Obstruct Plaintiffs Litigation by refusing To Provide Adequate legal Supplies.

The 1st Ammendment Prohibits both 'Retaliation' And The Wrongfull Obstruction Of Prisoners "Access To The Courts."

On January 1st 2020, Plaintiff Richards AND Kisse asked R.U.M Perttu For 'Legal Supplies', including 'Columned' Writing Paper. R.U.M Perttu responded plainly ; "No".

On Feb. 14th 2020, Plaintiffs Richards AND Pruitt asked R.U.M Perttu For Legal Supplies, including 'Columned' Writing Paper. R.U.M Perttu responded stating ; "Fuck you."

On April 9th AND 11th , All 3 Plaintiffs asked R.U.M Perttu for Legal Supplies, including Access To A Typewriter needed To Legibly Draft Their Legal Pleadings. R.U.M Perttu responded plainly ;
"Im NOT Giving you Guys shit."

R.U.M Perttu Also instructed 3 Unit Officers NOT To provide Legal Supplies or Legal materials To Plaintiffs.

Claim 6 ; 1

R.U.M Perttu in Retaliation Against Plaintiffs for Filing Grievances And Complaints, has illegally Destroyed And Vandalized Plaintiffs Personal Property.

On April 4th 2020, R.U.M Perttu Entered AMF Property Room And Slammed Plaintiffs KTV Television And Plaintiffs JPFive media player Against The Wall. These Items belonged To Plaintiff Kyle Richards. Both Plaintiffs Richards And Kisseel Observed R.U.M Perttu destroy These Items.

On April 14th, 2020, R.U.M Perttu Approached Plaintiff Richards Door, Taunting Him Saying: "Too Bad, You Cant Watch T.V or Play Games Now That I Smashed Your T.V." This Comment Was Also Witnessed by Plaintiffs Pruitt And Kisseel.

On April 15th 2020, R.U.M Perttu Entered Plaintiff Pruitts Cell while he was in The Shower. R.U.M Perttu Grabbed Several Folders Of Legal Documents And Threw Them In Plaintiff Pruitts Toilet bowl. Plaintiff Richards Directly Observed This Act From Across The Hallway. Plaintiff Pruitts Cell # is 238.

On April 16th, 2020, in The morning Hours, R.U.M Perttu Entered Plaintiff Kissees Cell # 230. He began Pilfering Through Plaintiff Kissees Legal Folders, And Tearing Up His Legal Documents.

Plaintiffs STAKE Their Claims Under U.S CONSTITUTION Ammenoments;

1st Amm. "Retaliation / Obstruction
OF ACCESS TO COURTS

5th Amm "Deprivation Of Property
WITHOUT Due Process"

14th Amm "Equal Protection /
Due Process

Claim 7 .)

On April 21st, 2020, R.U.M Perttu Entered 3 Unit, Opened The maintenance Closet And Shut Off The Water To Cells # 229, 230, And 238.

R.U.M Perttu stated aloud, "you Fuckers will die of Thirst Before I let any of you drink my water" R.U.M Perttu appeared Anky And Histerical.

R.U.M Perttu instructed Unit Officers To; "NOT Turn The Water On For These motherfuckers." many Unit Officers Expressed Theyre Afraid They'll lose Their Job if They Dont Obey Him.

All 3 Plaintiffs Are Endorring rapid Dehydration And After 12 hours Have become Lethargic And Are Shaking Terribly. Plaintiffs Fear For Their Life And Saftey And Face imminent Danger Of serious Physical Harm.

RELIEF REQUESTED

The Plaintiffs request The following monetary, Declaratory, And Injunctive relief For Each Claim ;

- 1.1 For Claim 1, plaintiffs seek individually For Each Plaintiff ; 100 Thousand Dollars in Punative Damages, 50 Thousand Dollars in Compensatory Damages, And A Strong Declaratory ruling 'Condemning' Such Horrific And Flagrantly Unconstitutional behavior.
- 2.1 For Claim 2, Plaintiffs seek individually For Each Plaintiff ; 100 Thousand Dollars in Punative Damages, 50 Thousand Dollars in Compensatory Damages, And A Strong Declaratory ruling 'Condemning' Such Flagrant Unconstitutional Misbehavior.
- 3.1 For Claim 3, Plaintiffs seek individually For Each Plaintiff ; 100 Thousand Dollars in Punative Damages, 50 Thousand Dollars in Compensatory Damages, And A strong declaratory ruling condemning defendants behavior.

Plaintiffs Also request For Claim 3, That This Court Issue A Perminant Injunction Ordering m.d.o.c / Defendant To release Plaintiffs From Segregation And To 'Specificly PROHIBIT m.d.o.c From placing Plaintiffs Back in Segregation.

Plaintiffs Also Ask This Court issue A Declaratory Ruling Condemning The Confinement Of mentally ill Prisoners, Like Plaintiff Richards In Segregation.

4.1 For Claim 4, Plaintiffs seek individually For Each Plaintiff; 50 Thousand Dollars in Punative Damages, 20 Thousand Dollars in Compensatory Damages, And An 'Injunction' Ordering m.d.o.c / Defendant To Provide Plaintiffs Access To JPAY JPS KIOSK'S AND TABLETS.

5.1 For Claim 5, Plaintiffs seek Individually For Each Plaintiff; 50 Thousand Dollars in Punative Damages, 20 Thousand Dollars in Compensatory Damages, And An 'Injunction' Ordering m.d.o.c Defendant To Provide Plaintiffs And Other Prisoners Access To Either 'columned' Lined Paper or A Typing machine.

6.1 For Claim 6, Plaintiffs seek individually for each plaintiff; 50 Thousand Dollars in Punative Damages And 10 Thousand Dollars in Compensatory Damages, And An 'Injunction' Ordering Defendant To 'Replace' Plaintiff Richards KTV And JPS Tablet / media player.

7.1 For Claim 7, Plaintiffs seek individually for each Plaintiff; 100 Thousand Dollars in punative Damages And 20 Thousand Dollars in Compensatory Damages, as well as A Declaratory Ruling Condemning Such behavior.

8.1 For All Claims, Plaintiffs request The Court Grant monetary Award In Full As Sought, Or Grant A Sum The Court Feels is Reasonable.

9.1 Plaintiff Richards Asks This Court issue A Injunction Strictly Prohibiting m.d.o.c or Defendant From placing Prisoner Richards in A Two man Cell, And Reinforcing His Single Cell Detail.

Verification

A "Verified" Complaint Carries The Same Weight AS AN AFFIDAVIT FOR THE PURPOSE OF EVIDENCE.

28 U.S.C § 1746 renders The following declaration A Valid Verification To All Facts And Allegations Stated in This Complaint.

" I declare Under The Penalty Of Perjury That The foregoing is True And Correct "

SIGNATURE



DATE

4-21-20

Kyle Richards #641715
Baraga maximum Correctional Facility
13924 Wadaga Rd, Baraga, MI, 49908

Verification

A "Verified" Complaint Carries The Same Weight AS AN AFFIDAVIT For The Purpose OF Evidence,

28 U.S.C 1746 renders The Following Declaration A Valid Verification TO All Facts AND Allegations STATED in This Complaint.

" I declare under The Penalty OF Perjury The Foregoing IS TRUE AND Correct."

SIGNATURE *Robert Lee Visser*

Print NAME ROBERT LEE VISSE #575639

Baraga maximum Correctional Facility
13924 Wadaga Rd.
Baraga, MI, 49908

4-21-20

Verification

A "Verified" Complaint Carries The Same Weight As An Affidavit For The Purpose Of Evidence,

28 U.S.C 1746 renders The Following Declaration A valid Verification To All Facts And Allegations Stated In This Complaint.

"d"

"I declare Under The Penalty Of Perjury The Foregoing Is True And Correct"

Signature Kenneth D. Pruitt Junior 708518

Print Name Kenneth D. Pruitt Junior 708518

Baraga maximum Correctional Facility
13924 Wadaga RD, Baraga, MI, 49908

4-21-20

LIST OF EXHIBITS

EXHIBIT A : "Report OF Dr. Mamoun Dabbagh"

EXHIBIT B : "Report OF Dr. Ismail Sendi"

Proof OF Plaintiff Richards mental
Disabilities, diagnosed by 2 Seperate
Doctors, making Plaintiff Richards
A 'Vulnerable Adult' Per mcl 750.145 m

EXHIBIT A

Page 2

HAVENWYCK HOSPITAL
1525 University Drive
Auburn Hills, Michigan 48326

Richards, Kyle
Mamoun Dabbagh, M.D.
MR#: 020015
AD: 03/03/05
DD: 03/08/05

The patient is alert and oriented, affect is brighter, and doing fair overall. Zoloft is changed to Effexor 37.5 mg q.d. and then increased to 37.5 mg b.i.d. There are no side effects noted from the medications. The patient is alert and oriented. Affect is brighter. He is more within normal limits in terms of his mood. He denies suicidal or homicidal ideation. There is no aggression.

RECOMMENDATIONS: The patient is discharged with the following recommendations: The patient will follow up with his primary care physician for all medical concerns and will be seen on an outpatient basis by Dr. Sendi and Dr. Bob Baringer for home based treatment.

DISCHARGE MEDICATIONS: Medications at the time of discharge are Adderall XR 30 mg q.a.m., Effexor XR 75 mg a.m., Lamictal 25 mg a.m. and h.s., and Abilify 20 mg h.s.

PROGNOSIS: Fair.

FINAL DIAGNOSES:

AXIS I: Major Depressive Disorder, Recurrent.
Attention Deficit Disorder.
Oppositional Defiant Disorder.

AXIS II: None.

AXIS III: None.

AXIS IV: Moderate.

AXIS V: GAF on Admission 25 and on Discharge 35.

Mamoun Dabbagh, M.D.

Transcribed by Global MD Systems (mdsis.com)

DICTATION DATE AND TIME:

03/26/05 02:24 PM

TRANSCRIPTION DATE AND TIME:

03/27/05 06:20 AM

HAVENWYCK HOSPITAL
1525 University Drive
Auburn Hills, Michigan 48326

Richards, Kyle
Mamoun Dabbagh, M.D.
MR#: 020015
AD: 03/03/05
DD: 03/08/05

CASE SUMMARY

DISCHARGE SUMMARY AND AFTERCARE PLAN

RESULTS OF ASSESSMENTS AND SIGNIFICANT FINDINGS:

- a. **History, Physical and Neurological Examination:** Performed by Dr. Kingsley Thomas. His impression is laceration to the left side of face. He recommends proper skin hygiene, psychotherapy, diet for age, participation in gym, and follow up with primary care physician.
- b. **Psychological Testing:** Not indicated.
- c. **Laboratory Testing:** Urine drug screen is positive for amphetamines. Blood chemistry profile and thyroid profile are within normal limits. A VDRL is nonreactive. Urinalysis shows moderate amount of calcium oxalate crystals. A complete blood count and differential shows a low white blood cell count of 4.0.
- d. **Activities:** The patient is to attend individual and group psychotherapy, school classes, and other age-appropriate milieu activities.

CLINICAL COURSE: The patient is a 15-year-old white male brought to the hospital accompanied by his parents with anger outburst, extreme oppositionality, walk out the classroom at school and left, scratching himself until he bleeds, biting his wrist, punching his mother's truck, having difficulty sleeping at night, and refusing to go to school. He is in outpatient treatment on Lamictal, Abilify, and Adderall. For additional information, please refer to the admission note.

The patient was initially placed on Lamictal 25 mg q.d., Abilify 15 mg h.s., and Adderall XL 30 mg a.m. There are no side effects noted from the medications. He is overactive, hyperactive, agitated and irritable with mood swings. He was given Lamictal 25 mg a.m. and h.s., Abilify 20 mg h.s., and Zoloft 25 mg a.m.

EXHIBIT B

Page 2

HAVENWYCK HOSPITAL
1525 University Drive
Auburn Hills, Michigan 48326

Richards, Kyle
Ismail B. Sendi, MD
MR#: 020015
AD: 03/14/05
DD: 03/16/05

PROGNOSIS: Fair-to-guarded.

FINAL DIAGNOSES:

Axis I: Pervasive Developmental Disorder.
Psychosis NOS.
Cognitive Perceptual Sensory Motor Deficit.
Axis II: Deferred.
Axis III: Healthy.
Axis IV: Severe.
Axis V: GAF: On admission 25-30 and on discharge 42.



Ismail B. Sendi, M.D.

Transcribed by Global MD Systems (mdsis.com)

DICTATION DATE AND TIME:

03/27/05 02:25 PM

TRANSCRIPTION DATE AND TIME:

03/28/05 06:30 AM

HAVENWYCK HOSPITAL
1525 University Drive
Auburn Hills, Michigan 48326

Richards, Kyle
Ismail B. Sendi, MD
MR#: 020015
AD: 03/14/05
DD: 03/16/05

CASE SUMMARY

DISCHARGE SUMMARY AND AFTERCARE PLAN

RESULTS OF ASSESSMENTS AND SIGNIFICANT FINDINGS:

- a. **History, Physical and Neurological Examination:** Done in a previous admission. Please refer to the chart for details.
- b. **Psychological Testing:** Not indicated.
- c. **Laboratory Testing:** Urine drug screen is positive for amphetamines.
- d. **Activities:** The patient is to attend individual and group psychotherapy, school classes, and other age-appropriate milieu activities.

CLINICAL COURSE: The patient is a 15-year-old male brought to the hospital after threatening to hurt himself with the knife and arguing with his father. He is very oppositional. The police had to be called. The patient is most recently on Adderall, Lamictal, and Abilify. For additional information, please refer to the admission note.

The patient was initially placed on Adderall XR 50 mg a.m. and increased dose of Lamictal to 50 mg b.i.d., and Abilify 5 mg b.i.d. On the unit the patient is very structured responsive. He is not a problem on the unit. There is no suicidal or homicidal ideation. There is no aggression. Social worker met with the patient and father. Confirmed the patient lack of participation and motivation for treatment. The patient is easily frustrated. The patient denies suicidal or homicidal ideation.

RECOMMENDATIONS: The patient is discharged with the following recommendations: The patient will follow up with primary care physician for all medical concerns. Continue with myself on an outpatient basis and Bob Baringer. He will also be referred to behavioral care management for in-home treatment.

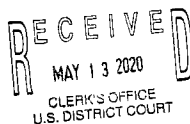
MEDICATIONS ON DISCHARGE: Medications at the time of discharge are Abilify 5 mg b.i.d., Lamictal 50 mg b.i.d, Adderall XR 15 mg a.m.

Kyle RICHARDS, Prisoner # 641715
Baraga maximum Correctional Facility
13924 Wadaga rd,
Baraga, MI, 49908



4/23/20
(PDS)

U.S. MARSHALS



Clerk
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
U.S. COURTHOUSE
231 W. LAFAYETTE Blvd,
DETROIT, MI, 48226